

REMARKS

The Examiner has objected to the abstract of the disclosure for including the terms “disclosed herein”. Applicant has provided herewith on a separate sheet a rewritten abstract that does not include the terms “disclosed herein”.

The Examiner has rejected claims 1-26 under 35 USC § 102(b) for being anticipated by Gano. The Examiner takes the position that Gano discloses among other things an orientation key 181 positioned at a deflectable finger 1404 (or 1425b). Applicant would like to point out initially that the alleged “orientation key” 181 is not an orientation key at all, having no function pertaining to orientation, but rather is a locking dog. The key provides for location in the axial direction of the borehole but provides absolutely no orientation function for the device. In addition hereto the “orientation key” 181 is not at the deflectable finger 1404 as contended by the Examiner. The “orientation key” 181 is not even on the same tool as the deflectable finger 1404. In fact, the deflectable finger 1404 is a portion of a wear bushing that is a separate tool run in the well to avoid damage to seals. The locking dog 181 on the other hand is a portion of the tool illustrated in Figs. 6A-6C. Since the tools having the features relied upon by the Examiner are in fact separate tools, and in addition, do not have the physical attributes or functions of the components claimed in applicants claims, they cannot possibly properly support maintenance of the rejection made by the Examiner. Applicant submits that an orientation key positioned at the deflectable finger as claimed in independent claims 1 and 10 and the method claims requiring running a collet having a deflectable orientation key in claim 22 and 26 are not taught by the reference and are patentable thereover.

It is further noted that the Examiner has alleged that Gano teaches a self-orienting selectable locating collet. Upon Applicant’s review of the reference there is no collet within the system disclosed by Gano that is self-orienting. The Examiner appears to have misinterpreted terms of the application utilizing the word root “orient” with respect to downhole tools. The term “orient” is related to axial *rotation* of a tool as opposed to axial

location of a tool. Locking dogs are almost always related to axial location of a tool (i.e. they prevent the tool from moving up or downhole from a desired position where those dogs are engaged with a groove in the wellbore tubing or casing) , which is indeed the case with components 181 in Gano. Orientation however refers to the specific rotation of the tool and where for example a bent sub or some other directional component of the tool would be pointed. This misunderstanding appears to have permeated all of the Examiner's rejections and is likely the reason for reliance on the Gano reference. Therefore in view of Applicant's statements hereinabove and this explanatory addition, Applicant's believe that the Examiner will readily agree that what is claimed in Applicant's claims 1, 10, 22, 26, and each of the dependent claims (which add further patentable features) are distinct from the Gano reference.

With respect to claims 20 and 25, in view of the above-identified term "orient" or "orientation", applicant believes that it will be apparent to the Examiner that the reference does not teach, disclosure nor suggest alignment with two orientation profiles each having a distinct matchable profile. This limitation is required in both claims 21 and 25 and is quite absent from the Gano reference.

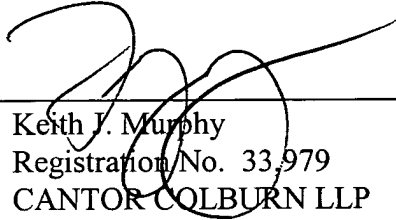
In the event the Examiner has any queries regarding the instantly submitted amendment, Applicants' attorney respectfully requests the courtesy of a telephone conference to discuss any matters in need of attention.

If there are any additional charges with respect to this Response or otherwise, please charge them to Deposit Account No. 02-0429 maintained by the Applicants' Attorneys.

Respectfully submitted,
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Date: January 18, 2006